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5 Attorney for Edgar Omar Herrera Farias

6
7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 EDGAR OMAR HERRERA FARIAS,

14 Defendant.
15
16

Cause No. 4:15-CR-06049-EFS-16

DECLARATION OF SHEA C.
MEEHAN IN SUPPORT OF
DEFENDANT EDGAR OMAR
HERRERA FARIAS'S MOTION TO
CONTINUE TRIAL DATE

17 The undersigned states as follows:
18

19 1. I, Shea C. Meehan, am over 18 years of age and competent to testify
20 to the following from personal knowledge.

21 2. I am counsel for defendant Edgar Omar Herrera Farias. I was
22 appointed as counsel for Mr. Herrera Farias on April 17, 2019 after his prior
23 counsel was granted leave to withdraw.
24
25

1 3. While I drafted and filed Mr. Herrera Farias's motion to withdraw his
2 guilty plea, I had not been involved in preparing the case to that point.

3
4 4. I am in the early stages of reviewing discovery and beginning
5 investigation of this matter. I did not believe it was prudent to begin a complete
6 review of discovery in the case until the court had decided Mr. Herrera Farias's
7 motion to withdraw his guilty plea.

8
9 5. The discovery consists of 10,279 documents and/or files containing
10 18,536 pages of information and 29 hours 34 minutes and 30 seconds of audio and
11 video recording.

12
13 6. August 17, 2020 is the next available trial date when counsel for the
14 government and I are both available for trial. Mr. Herrera Farias has agreed to
15 continue the trial until the proposed trial date.

16 I certify the foregoing to be true and correct under the penalty of perjury
17 under the laws of the State of Washington.

18
19 DATED this 14th day of February, 2020 at Richland, Washington.

20 s/ Shea C. Meehan
21 Shea C. Meehan, WSBA #34087
22 Attorney for Edgar Omar Herrera Farias
23
24
25

CERTIFICATE OF SERVICE

I certify that on February 14, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify the following:

Adam R. Pechtel, Caitlin A. Baunsgard, Dan Bruce Johnson, Jeffrey Scott Niesen, Lee Edmond, Lupe Rodriguez, Jr., Nicholas Wright Marchi, Nicolas V. Vieth, Ricardo Hernandez, Richard J. Troberman, Richard A. Smith, Scott W. Johnson, Stephanie A. Van Marter, Timothy A. Scott, Troy Joseph Lee, Victor H. Lara, Walter Lynn Ayers and Zachary Lynn Ayers.

And I certify that I have mailed by United States Postal Service a copy of the document to the following non-CM/ECF participant:

Rick Lee Hoffman
Federal Defenders - YAK
306 East Chestnut Avenue
Yakima, WA 98901

s/ Shea C. Meehan
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